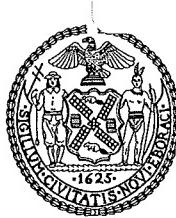


~~WITNESS ENDORSED~~



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#: 12-11-19  
DATE FILED: 12-11-19

JAMES E. JOHNSON  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

RACHEL K. MARCOCCIA  
Phone: (212) 356-2471  
Fax: (212) 256-1148  
rmarocc@law.nyc.gov

December 9, 2019

**VIA ECF AND EMAIL**

Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Re: *Dabah v. Franklin, et al.*, 19-cv-10579 (ALC)

Dear Judge Carter:

I am a Senior Counsel at the New York City Law Department and my office represents the City of New York in the above-referenced matter. In addition to the City of New York, Plaintiff has named as defendants six individuals who are alleged to have been employed at the New York City Administration for Children's Services ("ACS"). I write to respectfully request that the deadline for the City of New York as well as the individual defendants, namely Nicole Franklin, Rica Hazelwood, Felix Dumay, Myrtle Green, Sharon Atkins, and Sherill Douglas-Alexis (collectively, the "Defendants") to respond to the Complaint be extended from December 11, 2019 until January 31, 2020. The extension of time will allow my office to confirm which, if any, of the individual defendants are employed at ACS, and communicate with them and determine whether my office will represent them, and to allow us to ascertain whether service was proper as to all of the Defendants. In addition, my office requires additional time to review and investigate the allegations in the Complaint. Accordingly, I respectfully request an extension of time until January 31, 2020 for all Defendants to respond to the Complaint.

This is the Defendants' first request for an extension of time to respond to the Complaint, and Plaintiff consents to this extension.

Thank you for Your Honor's consideration.

Respectfully,

By: /s/ Rachel K. Marcoccia  
Rachel K. Marcoccia

cc: Counsel of Record (via ECF and Email)

SO ORDERED  
*Andrew L. Carter*  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

12-11-19